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March 3, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Ex parte* presentation in IB Docket No. 11-109;
IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and
SAT-MOD-20151231-00091**

Dear Ms. Dortch:

On March 1, 2017, Valerie Green, Geoff Stearn, and Santanu Dutta of Ligado Networks LLC (“Ligado”) and the undersigned met by phone with Ron Repasi and Paul Murray of the Office of Engineering and Technology; Charles Mathias and Paul Powell of the Wireless Telecommunications Bureau; and Bob Nelson of the International Bureau. The purpose of the meeting was to discuss Ligado’s operating parameters in the 1526 to 1536 MHz band (the “lower downlink”).

Ligado’s 2015 license modification applications requested that the Commission impose a license condition that would require Ligado to reduce the power of each of its terrestrial transmitters operating in the lower downlink to the power level necessary to achieve compatibility of the transmitter with current and future technical standards for certified aviation GPS receivers. We explained that Ligado’s extensive engagement with the FAA and other stakeholders has resulted in the development of a proposed model for the determination of this power limit, on which the FAA received comment from aviation industry stakeholders in December 2016. The requested license condition would require Ligado to operate each tower in the country at the power level determined by application of the model to such tower. In addition, to implement Ligado’s coexistence agreements with the major GPS equipment manufacturers, Ligado requested that the Commission’s license condition further prohibit the company from operating any transmitter at a power level above 32 dBW, nationally, and without regard to any interference models related to the FAA certification standards. Thus, the license condition would require Ligado to operate each base station antenna sector at a transmit EIRP that is determined by the models developed in consultation with the FAA, and in no case more than 32 dbW.

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Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron

Gerard J. Waldron

Brian Smith

Counsel to Ligado Networks LLC

cc: Mr. Charles Mathias
Mr. Bob Nelson
Mr. Paul Murray
Mr. Ron Repasi
Mr. Paul Powell